

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

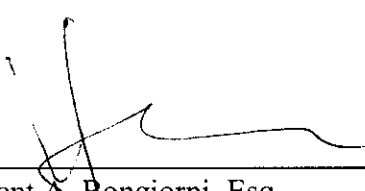
UNITED STATES OF AMERICA    )  
  )  
vs.                                    ) No. 03-30047-MAP  
  )  
MELVIN RICHARDSON                )

**DEFENDANT'S MOTION TO RECONSIDER ORDER  
OF DETENTION**

Now comes the defendant, by and through counsel, and moves this Honorable Court for a reconsideration of its previous order of detention dated November 3, 2003, and as his basis, therefore, asserts that there are changed circumstances which warrant a reconsideration of this Court's initial order including but not limited to; the defendant's employment, residence, probation status, drug treatment, as well as the defendant's proposed conditions of release as more fully set forth in the attachments to this motion.

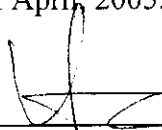
WHEREFORE, the defendant requests this Court grant him a reconsideration of its original order.

THE DEFENDANT

BY:  \_\_\_\_\_  
Vincent A. Bongiorno, Esq.  
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Springfield, MA. 01103  
(413) 732-0222  
BBO #049040

CERTIFICATE OF SERVICE

I, Vincent A. Bongiorno, Esq., do hereby certify that I have served a copy of the foregoing to the Assistant United States Attorney, United States District Court, 1550 Main Street, Springfield, MA. 01103 this 28 day of April, 2005.

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Vincent A. Bongiorno

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA    )  
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vs.    ) No. 03-30047-MAP  
  )  
MELVIN RICHARDSON                        )

**PROPOSED CONDITIONS OF RELEASE**

1.     The defendant will be maintained on 24 hour electronic monitoring.
2.     The defendant will be maintained on 24 hour house arrest.
3.     The defendant will post a parcel of real estate located at 170 Grove Avenue, Springfield, MA. with a fair market value of \$100,000 and a net equity in the same amount.
4.     The defendant will report to the pretrial services department of this Court daily.